

Response to ESC Draft Decision on GWW Pricing Submission from Macedon Water Think Tank

The Macedon Water Think Tank is an alliance of community groups investigating all aspects of management of water in the Deep Creek and Jacksons Creek catchments of the Maribyrnong River. Our view is that more people and less water mean that business-as-usual in water management is not going to cut it. We want to give informed opinion on the policies, investment and services needed, and that means understanding how services are delivered now, and the options ahead. In partnership with GWW, we are looking at wastewater treatment, waterways health, groundwater-dependent ecosystems, water supply, stormwater management and allocation of surface and groundwater.

Our opinion is that the ESC's draft decision will compromise GWW's capacity to meet its outcome to 'heal and care for Country'. Four areas of GWW activity are at issue.

1. *Cutting the Stormwater Harvesting Fund* significantly reduces GWW capacity to protect the health of waterways. Waterways are living entities, not drains. Stormwater is a real and present danger to creeks, which bear the cost of under investment in management of stormwater treatment. GWW funding for stormwater projects contributes to its commitment to heal and care for Country in two ways:
 - Increasing stormwater use in areas like ovals and parks reduces the take required for consumptive use. 2022 CGRSWS included an ambitious target to recover 7 GL of water in the Maribyrnong system (Policy 8-6, Action 8-11) and to increase water available for environmental flow in waterways.
 - Growth of residential areas in Romsey, Riddells Creek, Gisborne and Sunbury increases hard surfaces and flow of stormwater into creeks. Unfiltered stormwater entering waterways degrades instream life by increasing turbidity, and introducing nutrients and chemicals toxic to instream life. Stormwater flows from big rain events, when unbuffered by stormwater works, scour the banks of creeks and disrupt the breeding cycle of invertebrates and insects on which surrounding wildlife depend.

For example, Deep Creek Landcare Group has been urging Macedon Ranges Shire Council to develop a wetland on the Romsey South Drain to filter and slow stormwater before it enters Deep Creek. The Romsey Structure Plan will increase residential areas dramatically and with that the flow of stormwater into the South Drain. GWW's stormwater funding could assist MRSC develop that wetland.
2. We are pleased to see that the ESC draft decision has supported *investment in up-grades to treatment and supply infrastructure*, in particular, the upgrades to Woodend Recycled Water Plant and Gisborne Recycled Water Plant, and infrastructure that allows for more efficient and more effective delivery of water into and out Rosslynne Reservoir.

Improvements at Rosslynne give some assurance to us that GWW will not be over-reliant on water supply from the small reservoirs of the Macedon Range, and will be able to draw from the Melbourne system when extraction threatens the health of local creeks. For example, we have evidence that extraction from Garden Hut Reservoir has compromised the health of Garden Hut Creek, a major tributary of Deep Creek. The ability to draw from the Melbourne system via Rosslynne gives GWW supply options that reduce these environmental impacts.

However, we note that Romsey Recycled Water Plant does not figure in GWW's forward investment program. In our view, that treatment plant is falling behind growth in demand and is poorly positioned to deliver the ambitious goals set by GWW and the Macedon Ranges Shire Council.

The community group *Better Futures Romsey* has raised concerns about the Romsey plant directly with the ESC, and we reiterate these concerns here because they affect communities downstream from Romsey and communities in the upper Maribyrnong experiencing rapid growth, such as Riddells Creek:

- inconsistency in population forecasts being used by GWW and MRSC in planning for growth in capacity of wastewater treatment;
- contraction of the wastewater treatment plant buffer zone at Romsey, putting it close to residential areas;
- planning for extreme weather (both high rainfall events and extended drought conditions) and likely impacts on surface water flows and discharge from the treatment plant;
- failure to find local users for treated waste water;
- dependence on discharge of treated water to waterways and on lagoon technology. with no plans to upgrade that to achieve higher quality treated water;
- lack of transparency around the use of and impact of chlorine treatment to achieve Class B water;
- lack of monitoring of levels of chlorine, phosphorus and nitrogen in discharge to Deep Creek and lack of evidence-based understanding of the impacts of chlorine, phosphorus and nitrogen levels on livestock, macroinvertebrates and fish in Deep Creek.

Is GWW making the investments that will keep wastewater treatment ahead of demand? We are not convinced it is. We urge the ESC to look closely at this and assure communities in the Macedon Ranges that treatment capacity will meet demand, and that the health of waterways and of enterprises that depend on water from waterways will not be compromised as our towns grow.

3. *Reducing investment in improving monitoring of GWW assets* will increase unplanned damage to waterways. Waste water treatment monitoring lets managers know when critical levels are being approached and avoid damaging release of inadequately treated water into waterways. Monitoring of the water supply system identifies burst mains and allows rapid action that reduces flow of sediment and cold water that disrupts stream biota be taken.
4. *Cuts to GWW's water main renewal program* threatens the health of creeks. Burst mains send cold, chlorinated water into creeks, along with sediment, in an unseasonal surge of water that disrupts in-stream and riparian biota. Renewal of supply lines reduces GWW reliance on local reservoirs, allowing more water to flow from headwaters into the Maribyrnong.

Macedon Water Think Tank.

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Deep Creek Landcare Group



Macedon and Mount Macedon Landcare Group



Newham and District Landcare Group



Riddells Creek Landcare



Friends of Mt Gisborne

Clarkefield and District Landcare



Greening Of Riddell



Friends of Steele Creek



Maribyrnong River and Waterways Association

